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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X  
ASHOT EGIAZARYAN, :  
Plaintiff, : 11 CV 02670 (PKC) (GWG)  
-against- : ECF  
PETER ZALMAYEV, :  
Defendant. :  
-----X

JONATHAN D. LUPKIN, hereby declares, under penalty of perjury pursuant to 28 U.S.C. § 1746, as follows:

1. I am a member of the law firm Flemming Zulack Williamson Zauderer LLP, counsel for Plaintiff Ashot Egiazaryan in the above-captioned action. I submit this declaration in support of Plaintiff's Motion for a Protective Order.
2. Annexed as Exhibit 1 is a true and correct copy of the Transcript of the Discovery Conference held on November 8, 2011.
3. Annexed as Exhibit 2 is a true and correct copy of Defendant's Letter to Magistrate Judge Gorenstein, dated October 17, 2011, without its accompanying exhibits.

4. Annexed as Exhibit 3 is a true and correct copy of the “summary of Peter Zalmayev’s planned depositions,” submitted to the Court by defendant Peter Zalmayev on November 7, 2011.

5. Annexed as Exhibit 4 is a true and correct copy of relevant excerpts from the Transcript of the Deposition of Mark Levin, Executive Director of National Conference on Soviet Jewry, taken on September 15, 2011.

6. Annexed as Exhibit 5 is a true and correct copy of relevant excerpts from the Transcript of the Deposition of Leslie Weiss, Director of Community Services and Cultural Affairs for National Conference on Soviet Jewry, taken on September 15, 2011.

7. Annexed as Exhibit 6 is a true and correct copy of relevant excerpts from the Transcript of the Deposition of Sam Kliger, Director of Russian Jewish Community Affairs at the American Jewish Committee, taken on October 10, 2011.

8. Annexed as Exhibit 7 is a true and correct copy of relevant excerpts from the Transcript of the Deposition of Jeffrey Birnbaum, President of BGR Public Relations, Inc., taken on September 28, 2011.

9. Annexed as Exhibit 8 is a true and correct copy of relevant excerpts from the Draft Transcript of the Deposition of Douglas Bloomfield, former legislative director of AIPAC and paid consultant to Mr. Zalmayev in furtherance of the anti-Egiazaryan smear campaign, taken on November 11, 2011.

10. Annexed as Exhibit 9 is a true and correct copy of relevant excerpts from Defendants’ Request for the Production of Documents, dated July 18, 2011.

11. Annexed as Exhibit 10 is a true and correct copy of Plaintiff’s Initial Disclosures Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, dated July 8, 2011.

12. Annexed as Exhibit 11 is a true and correct copy of relevant excerpts from defendant Peter Zalmayev's Memorandum of Law in Support of his Motion to Dismiss the Complaint Pursuant to Federal Rule 12(b)(6), dated June 20, 2011.

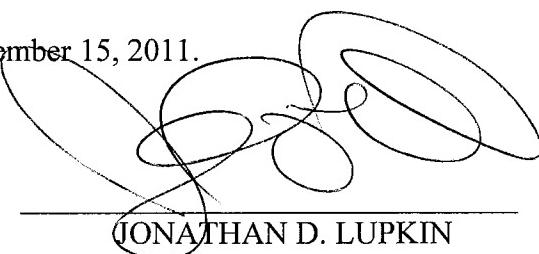
13. Annexed as Exhibit 12 is a true and correct copy of relevant excerpts from defendant Peter Zalmayev's Memorandum of Law in Opposition to Ashot Egiazaryan's Motion to Dismiss the Counterclaims Pursuant to Federal Rule 12(b)(6) and to Strike Portions of the Counterclaims Pursuant to Federal Rule 12(f), dated September 15, 2011.

14. Annexed as Exhibit 13 are true and correct copies of the Proposal by Bloomfield Associates, Inc., dated February 7, 2011 (the "Proposal"), and its attached 13-page legal memorandum prepared by the National Immigration Law Group.

15. Annexed as Exhibit 14 is a true and correct copy of the "Memcon" prepared by Mr. Zalmayev's collaborator, Rinat Akhmetshin, incorporating the Proposal and discussing conference calls with Mr. Zalmayev.

I declare under penalty of perjury that the foregoing is true and correct.

Executed in New York, New York on November 15, 2011.



JONATHAN D. LUPKIN